



WESTON SOLUTIONS, INC.
205 CAMPUS DRIVE
EDISON, NEW JERSEY 08837
732-417-5800 • FAX: 732-417-5801

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OCT - 7 2014

Pesticides & Toxic Substances Branch

VIA FEDEX

October 3, 2014

Susan Schulz, Toxics Section Chief
U.S. EPA Region II
Pesticides & Toxic Substances Branch
2890 Woodbridge Avenue
Bldg. 10 (MS-105)
Edison, NJ 08837-3679

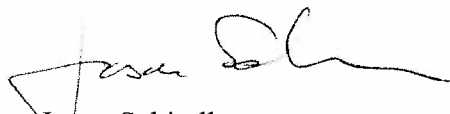
Mr. John M. Mitch, Clerk
Woodbridge Township
1 Main Street
Woodbridge, New Jersey 07095

Re: Hatco Site
Fords, New Jersey
Program Interest Number G000003943

Dear Ms. Schulz and Mr. Mitch:

Weston Solutions, Inc. (Weston) is forwarding Progress Report Number 36, which covers the activities associated with the Hatco Site from June 1, 2014 through August 31, 2014. The progress report is being submitted in accordance with the requirements of Weston's May 25, 2005 Administrative Consent Order and March 30, 2005 USEPA approval letter. If you have any questions, please do not hesitate to contact me at (732) 417-5804.

Very truly yours,
WESTON SOLUTIONS, INC.


Jason Schindler
Senior Project Manager

cc: M. Fisher – LSRP (ELM)
P. Meyer, S. Castles, K. Etela (Hatco/Chemtura)
K. Aiello (MCUA)
V. Puranapanda, S. Piatkowski, C. Stella, S. Anthony (ACE)
File No. 2.5

ADMINISTRATIVE CONSENT ORDER
PROGRESS REPORT

1. Progress Report Number: 36
2. Site Location: Hatco Site
 1020 King Georges Post Road
 Fords, NJ 08863
3. Signatories: Weston Solutions, Inc.
 ACE American Insurance Company
 New Jersey Department of Environmental Protection
4. Reporting Period: June 1, 2014 through August 31, 2014
5. Specific Requirements Initiated and Completed During Reporting Period:
 - 5.1 Weston submitted Progress Report No. 35 on July 3, 2014.
 - 5.2 Weston provided monthly email updates to EPA on June 5, July 1 and August 5, 2014.
 - 5.3 By letter dated June 4, 2014 Weston provided data and a request approval for soil excavated by Chemtura during water line repairs to be used as backfill during the Northeast Impoundment remediation. Additional information was provided by email on July 16, 2014 in support of this request.
 - 5.4 Completed public notification on June 5, 2014 in support of an extension to the NJPDES permit for the Northeast Impoundment remediation.
 - 5.5 On June 10, 2014 Weston submitted an application to NJDEP for modification to the wetlands disturbance general permit as needed for remediation of the Southeast Leg within mapped wetland and transition zones at the site.
 - 5.6 Weston issued request for proposal and construction bid specification to contractors for remediation of the Southeast Leg. Weston provided two copies of the construction specification to EPA by overnight delivery sent on July 2, 2014.
 - 5.7 By email dated July 2, 2014, Weston withdrew the request for EPA approval of offsite thermal treatment and reuse of soil from the Northeast Impoundment.
 - 5.8 Recovered LNAPL was shipped offsite for disposal on July 14, 2014.
 - 5.9 On July 16, 2014, Weston provided concept plans for the final Lagoon Area Cap and requested EPA concurrence that the plans are consistent with project requirements.
 - 5.10 Completed geotechnical analysis of Woodbridge Pond sediments for dewatering and possible placement in the Former Lagoon Area.
 - 5.11 Obtained approval from Chemtura to relocate Woodbridge Pond sediments to the Former Lagoon Area and/or Southeast Leg remediation area for final disposition.
 - 5.12 Completed monthly meetings and coordination with LSRP.
 - 5.13 Obtained permits required for remediation of the Southeast Leg including:
 - Soil Erosion and Sediment Control Plan certification
 - NJDEP Discharge to Groundwater Permit By Rule
 - NJDEP Wetlands Disturbance Permit Modification

6. Specific Requirements Previously Initiated Which are Continuing:

- 6.1 Continuation of full-scale LNAPL recovery – Through August 31, 2014, we have recovered approximately 7,419 gallons of LNAPL.
- 6.2 Weston continued development of Remedial Action Work Plan Addendum 4 for Woodbridge Pond. This plan will be finalized after development of an NJDEP-approved site-specific ecological risk-based remediation goal for bis(2-ethylhexyl)phthalate.
- 6.3 Maintenance and reporting for Phase 2 wetlands areas.
- 6.4 Geotechnical evaluation and design activities for capping of former lagoon area and planning for final site cap areas.
- 6.5 Remediation planning for completion of isolated soil scrape areas with PCBs concentrations greater than 2 milligrams per kilogram (mg/kg).
- 6.6 Development of a sampling program to evaluate if capping of naphthalene-contaminated soils is possible under new NJDEP guidance for remediation of the Northeast Impoundment and to verify the extent of soil remediation required, revising remediation approach and procurement of subcontractors as appropriate.
- 6.7 Evaluation of conceptual remediation approaches for Woodbridge Pond, coordination with stakeholders, revision of draft RAWP and preparation of permit applications.
- 6.8 Coordination with specialty subcontractor for developing site-specific ecological risk-based remediation goal for bis(2-ethylhexyl)phthalate as appropriate for offsite AOCs.
- 6.9 Preparation of Case Inventory Document for LSRP review and to guide ongoing LSRP close-out of AOC remediation activities that have been completed.
- 6.10 Preparation of draft remediation report documentation for LSRP review and approval and monthly progress meetings with the LSRP.
- 6.11 Evaluation of conceptual remediation approaches for Channel D.
- 6.12 Planning for disposal of drums of accumulated PPE and IDW, currently scheduled for removal on October 13, 2014.
- 6.13 By letter dated July 31, 2014, EPA RCRA Compliance Branch requested background information regarding the project. By letter dated August 8, 2014, Weston requested an extension to comply with the information request. During a telephone conference with the EPA reviewer, Ronald Voelkel, Weston discussed the requirements of the information to be provided. By letter dated August 27, 2014, EPA granted a 60-day extension. Weston's response to the information request is due on or before November 1, 2014.
- 6.14 On August 25, 2014, Weston initiated supplemental sampling activities including:
 - Delineation of contamination at Scrape Areas X001 and X029;
 - Delineation of crystalline naphthalene residue near the foundation of Warehouse No. 5 in the Northeast Impoundment Area;
 - Installation, modification and repairs of groundwater monitoring wells in the Northeast Impoundment Area and MW-57S;
 - Soil reuse sampling for the Southeast Leg remediation.This work will continue through October.

7. Specific Requirements Scheduled for Completion, but not Completed During the Reporting Period:

- 7.1 Preparation of RAWP Addendum 4.

8. Explanation for Each Item of Non-Completion in Item 7:

- 8.1 Completion of the RAWP Addendum 4 has been postponed until finalization of a site-specific ecological risk-based remediation goal for bis (2-ethylhexyl) phthalate. This process is ongoing with the LSRP.

9. Specific Requirements to be Initiated in Next Reporting Period (September 2014 - November 2014):

- 9.1 Complete field sampling program to evaluate if capping option is possible for remediation of Northeast Impoundment impact-to-groundwater soil contamination and revise remediation approach as appropriate, including applicable permit modifications.
- 9.2 Implement Southeast Leg remediation program.
- 9.3 Arrange for technical consultation with NJDEP regarding site-specific ecological risk-based remediation goal for BEHP.
- 9.4 Provide USEPA with diagram showing the extent and construction of the cap for the reused soil in the Southeast Leg.
- 9.5 Provide response to RCRA Compliance request for information on or before November 1, 2014.



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JUL -7 2014

Pesticides & Toxic Substances Branch

VIA FEDEX

July 3, 2014

Susan Schulz, Toxics Section Chief
U.S. EPA Region II
Pesticides & Toxic Substances Branch
2890 Woodbridge Avenue
Bldg. 10 (MS-105)
Edison, NJ 08837-3679

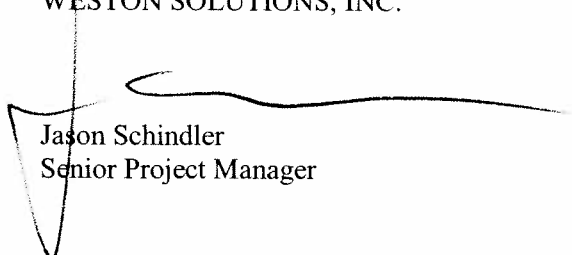
Mr. John M. Mitch, Clerk
Woodbridge Township
1 Main Street
Woodbridge, New Jersey 07095

Re: Hatco Site
Fords, New Jersey
Program Interest Number G000003943

Dear Ms. Schulz and Mr. Mitch:

Weston Solutions, Inc. (Weston) is forwarding Progress Report Number 35, which covers the activities associated with the Hatco Site from March 1, 2014 through May 31, 2014. The progress report is being submitted in accordance with the requirements of Weston's May 25, 2005 Administrative Consent Order and March 30, 2005 USEPA approval letter. If you have any questions, please do not hesitate to call me at (732) 417-5804.

Very truly yours,
WESTON SOLUTIONS, INC.


Jason Schindler
Senior Project Manager

cc: M. Fisher – LSRP (ELM)
P. Meyer, S. Castles, K. Etela (Hatco/Chemtura)
K. Aiello (MCUA)
V. Puranapanda, S. Piatkowski, C. Stella, S. Anthony (ACE)
File No. 2.5

ADMINISTRATIVE CONSENT ORDER
PROGRESS REPORT

1. Progress Report Number: 35
2. Site Location: Hatco Site
 1020 King Georges Post Road
 Fords, NJ 08863
3. Signatories: Weston Solutions, Inc.
 ACE American Insurance Company
 New Jersey Department of Environmental Protection
4. Reporting Period: March 1, 2014 through May 31, 2014
5. Specific Requirements Initiated and Completed During Reporting Period:
 - 5.1 Provided monthly email updates to EPA, completed a progress review call with EPA on March 4, 2014, and issued letters to EPA on March 18 and May 28 requesting feedback on technical issues.
 - 5.2 April 3, 2014 submission of Progress Report No. 34.
 - 5.3 Scheduled site visit for April 10, 2014 was cancelled by EPA.
 - 5.4 Conducted subcontractor bidding for remediation of the northeast impoundment. NJDEP recently issued new guidance during bid period that allows for capping of soils containing naphthalene concentrations above the calculated site-specific impact to groundwater soil remediation standard. Remediation of the northeast impoundment delayed to assess best approach for remediation of this material.
 - 5.5 April 21, 2014 shipment of recovered LNAPL waste for offsite disposal
 - 5.6 Performed geotechnical evaluation and topographic survey of current lagoon area, and prepared draft conceptual design for final lagoon cap.
 - 5.7 Completed sampling of Woodbridge Pond sediment for geotechnical analysis for placement on former lagoon soil stockpile area.
 - 5.8 Completed delineation sampling within southeast leg LNAPL soil area to support preparation of remediation bid specification.
 - 5.9 Completed monthly meetings and coordination with LSRP.
 - 5.10 Completed coordination with Woodbridge Township, EPEC (Kinder Morgan) and its LSRP (Brown & Caldwell), and the Keasbey Brownfield Development Area (BDA) Committee, including Edison Wetlands
 - 5.11 Completed delineation sampling at Channel D, Conrail ROW, Woodbridge Pond and on-site locations and distributed preliminary results.
6. Specific Requirements Previously Initiated Which are Continuing:
 - 6.1 Continuation of full-scale LNAPL recovery – Through May 31, 2014, we have recovered approximately 6,471 gallons of LNAPL.
 - 6.2 Maintenance and reporting for Phase 2 wetlands areas.
 - 6.3 Geotechnical evaluation and design activities for capping of former lagoon area and planning for final site cap areas.
 - 6.4 Remediation planning for completion of isolated soil scrape areas with PCBs concentrations greater than 2 milligrams per kilogram (mg/kg).

- 6.5 Development of a sampling program to evaluate if capping of naphthalene-contaminated soils is possible under new NJDEP guidance for remediation of the northeast impoundment and to verify the extent of soil remediation required, revising remediation approach and procurement of subcontractors as appropriate.
- 6.6 Preparation of a construction bid specification for remediation of the southeast leg LNAPL soil area, and applicable NJDEP and Freehold Soil Conservation District permit applications.
- 6.7 Evaluation of conceptual remediation approaches for Woodbridge Pond, coordination with stakeholders, revision of draft RAWP and preparation of permit applications.
- 6.8 Coordination with specialty subcontractor for developing site-specific sediment remediation standard for bis(2-ethylhexyl)phthalate as appropriate for offsite AOCs.
- 6.9 Preparation of Case Inventory Document for LSRP review and to guide ongoing LSRP close-out of AOC remediation activities that have been completed.
- 6.10 Preparation of draft remediation report documentation for LSRP review and approval and monthly progress meetings with the LSRP.
- 6.11 Evaluation of conceptual remediation approaches for Channel D.
- 6.12 Planning for disposal of drums of accumulated PPE and IDW, currently scheduled for removal on July 14, 2014.

7. Specific Requirements Scheduled for Completion, but not Completed During the Reporting Period:

- 7.1 None

8. Explanation for Each Item of Non-Completion in Item 7:

- 8.1 Not Applicable

9. Specific Requirements to be Initiated in Next Reporting Period (June 2014 - August 2014):

- 9.1 Implementation of sampling program to evaluate if capping option is possible for remediation of northeast impoundment impact-to-groundwater soil contamination and revise remediation approach as appropriate, including applicable permit modifications.
- 9.2 Completion of procurement of subcontractor for remediation of southeast leg LNAPL soil area and start of remediation.
- 9.3 Agreement among stakeholders on remediation approach for Woodbridge Pond, preparation of RAWP Addendum.
- 9.4 Stakeholder approval of design for capping of former lagoon soil stockpile area.



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April 3, 2014

Susan Schulz, Toxics Section Chief
U.S. EPA Region II
Pesticides & Toxic Substances Branch
2890 Woodbridge Avenue
Bldg. 10 (MS-105)
Edison, NJ 08837-3679

Mr. John M. Mitch, Clerk
Woodbridge Township
1 Main Street
Woodbridge, New Jersey 07095

Re: Hatco Site
Fords, New Jersey
Program Interest Number G000003943

Dear Ms. Schulz and Mr. Mitch:

Weston Solutions, Inc. (Weston) is forwarding Progress Report Number 34, which covers the activities associated with the Hatco Site from December 1, 2013 through February 28, 2014. The progress report is being submitted in accordance with the requirements of Weston's May 25, 2005 Administrative Consent Order and March 30, 2005 USEPA approval letter. If you have any questions, please do not hesitate to call me at (732) 417-5804.

Very truly yours,
WESTON SOLUTIONS, INC.

Jason Schindler
Senior Project Manager

cc: M. Fisher – LSRP (ELM)
P. Meyer, S. Castles, K. Etela (Hatco/Chemtura)
K. Aiello (MCUA)
V. Puranapanda, S. Piatkowski, C. Stella, G. Kramer (ACE)
M. Miller (Drinker, Biddle & Reath)
File No. 2.5

ADMINISTRATIVE CONSENT ORDER
PROGRESS REPORT

1. Progress Report Number: 34
2. Site Location: Hatco Site
1020 King Georges Post Rd.
Fords, NJ 08863
3. Signatories: Weston Solutions, Inc.
ACE American Insurance Company
NJDEP
4. Reporting Period: December 1, 2013 through February 28, 2014
5. Specific Requirements Initiated and Completed During Reporting Period:
 - 5.1 January 2, 2014 submission of Progress Report No. 33
 - 5.2 Received letter from EPA dated December 20, 2013 denying an extension of on-site remediation waste stockpile time limit
 - 5.3 January 24, 2014 shipment of collected LNAPL waste for offsite disposal
 - 5.4 Received NJDEP approval of Flood Hazard Area Permit for Northeast Impoundment remediation
 - 5.5 Provided monthly email updates to EPA and completed update meeting with EPA on February 10, 2014
 - 5.6 Completed monthly meetings and coordination with LSRP
 - 5.7 Completed coordination with Woodbridge Township, EPEC (Kinder Morgan) and its LSRP (Brown & Caldwell), and the Keasbey Brownfield Development Area (BDA) Committee, including Edison Wetlands
 - 5.8 Completed and distributed sampling plans for delineation sampling at Channel D, Conrail ROW, Woodbridge Pond and on-site locations
6. Specific Requirements Previously Initiated Which are Continuing:
 - 6.1 Continuation of full-scale LNAPL recovery – Through February 28, 2014, we have recovered approximately 5,885 gallons of LNAPL
 - 6.2 Maintenance and reporting for Phase 2 wetlands areas
 - 6.3 Geotechnical evaluation and design activities for capping of former lagoon soil stockpile and planning for final site cap areas
 - 6.4 Remediation planning for completion of isolated soil scrape areas with PCBs > 2 ppm
 - 6.5 Preparation of a contractor bid spec for remediation of the Northeast Impoundment
 - 6.6 Planning for movement of temporary scrape area soil stockpiles to the lagoon stockpile area, as per EPA direction
 - 6.7 Planning for remediation of southeast leg LNAPL removal, Northeast Impoundment remediation; Woodbridge Pond remediation
 - 6.8 Mobilization planning for delineation sampling at Woodbridge Pond, Channel D, Conrail ROW and for on-site locations
 - 6.9 Completion of delineation field sampling in Channel D during February 2014

- 6.10 Preparation of Case Inventory Document for LSRP review and to guide ongoing LSRP close-out of AOC remediation
- 6.11 Preparation of draft remediation report documentation for LSRP review and approval; plus continuation of LSRP coordination meetings
- 6.12 Evaluation of conceptual remediation approaches for Woodbridge Pond, following EPA meeting on February 10, 2014
- 6.13 Planning for disposal of drums of accumulated PPE and IDW

7. Specific Requirements Scheduled for Completion, but not Completed During the Reporting Period:

- 7.1 None

8. Explanation for Each Item of Non-Completion in Item 7:

- 8.1 Not Applicable

9. Specific Requirements to be Initiated in Next Reporting Period (March 2014 -May 2014):

- 9.1 Implementation of dewatering and remediation of Northeast Impoundment
- 9.2 Completion and reporting of delineation sampling of Woodbridge Pond, Conrail ROW, Channel D area and limited scrape areas
- 9.3 Completion of movement of scrape area soil stockpiles to lagoon area stockpile and evaluation of ceramic disks, in accordance with EPA direction



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205 CAMPUS DRIVE
EDISON, NEW JERSEY 08837
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January 2, 2014

Susan Schulz, Toxics Section Chief
U.S. EPA Region II
Pesticides & Toxic Substances Branch
2890 Woodbridge Avenue
Bldg. 10 (MS-105)
Edison, NJ 08837-3679

Mr. John M. Mitch, Clerk
Woodbridge Township
1 Main Street
Woodbridge, New Jersey 07095

Re: Hatco Site
Fords, New Jersey
Program Interest Number G000003943

Dear Ms. Schulz and Mr. Mitch:

Weston Solutions, Inc. (Weston) is forwarding Progress Report Number 33, which covers the activities associated with the Hatco Site from October 1, 2013 through November 30, 2013. The progress report is being submitted in accordance with the requirements of Weston's May 25, 2005 Administrative Consent Order and March 30, 2005 USEPA approval letter. If you have any questions, please do not hesitate to call me at (732) 417-5888.

Very truly yours,
WESTON SOLUTIONS, INC.

A handwritten signature in black ink, appearing to read "Michael A. Skirka".

Michael A. Skirka
Project Manager

cc: M. Fisher – LSRP (ELM)
P. Meyer, S. Castles, K. Etela (Hatco/Chemtura)
K. Aiello (MCUA)
V. Puranapanda, S. Piatkowski, C. Stella, G. Kramer (ACE)
M. Miller (Drinker, Biddle & Reath)
File No. 2.5

ADMINISTRATIVE CONSENT ORDER
PROGRESS REPORT

1. Progress Report Number: 33
2. Site Location: Hatco Site
1020 King Georges Post Rd.
Fords, NJ 08863
3. Signatories: Weston Solutions, Inc.
ACE American Insurance Company
NJDEP
4. Reporting Period: October 1, 2013 through November 30, 2013
5. Specific Requirements Initiated and Completed During Reporting Period:
 - 5.1 October 14, 2013 submission of Progress Report No. 32
 - 5.2 Submitted letter to EPA dated October 23, 2013 requesting an extension of on-site remediation waste stockpile time limit
 - 5.3 October 25, 2013 shipment of collected LNAPL waste for offsite disposal
 - 5.4 Received FSCD approval of Soil and Erosion Control Plan for Northeast Impoundment remediation
 - 5.5 Received NJDEP comments requiring revisions for the Flood Hazard Area Permit application for Northeast Impoundment remediation
 - 5.6 Completed meetings with LSRP
 - 5.7 Completed meetings with Woodbridge Township, EPEC (Kinder Morgan) and its LSRP (Brown & Caldwell), and the Keasbey Brownfield Development Area (BDA) Committee, including Edison Wetlands.
 - 5.8 Completed revised access agreements with Woodbridge Township for access to the Woodbridge Pond and Channel D parcels
6. Specific Requirements Previously Initiated Which are Continuing:
 - 6.1 Continuation of full-scale LNAPL recovery – Through November 30, 2013, we have recovered approximately 5,450 gallons of LNAPL
 - 6.2 Maintenance and reporting for Phase 2 wetlands areas
 - 6.3 Geotechnical evaluation of former lagoon soil stockpile for capping
 - 6.4 Remediation planning for completion of isolated soil scrape areas with PCBs > 2 ppm
 - 6.5 Final revisions to Northeast Impoundment Flood Hazard Permit application after receipt of NJDEP comments on prior submittal
 - 6.6 Preparation of a contractor bid spec for remediation of the Northeast Impoundment
 - 6.7 Planning for remediation of southeast leg LNAPL removal, Northeast Impoundment remediation; Woodbridge Pond remediation
 - 6.8 Review of additional sampling needs at Woodbridge Pond, Channel D area, and for limited site scrape areas, including preparation of draft sampling plans. Completed a site recon walk within the Gredel and Woodbridge parcels of Channel D area on November 22, 2013 to identify proposed delineation sample locations

- 6.9 Preparation of Case Inventory Document for LSRP review and to guide ongoing LSRP close-out of AOC remediation
- 6.10 Preparation of draft remediation report documentation for LSRP review and approval; plus continuation of LSRP coordination meetings
- 6.11 Evaluation of conceptual remediation approaches for Woodbridge Pond

7. Specific Requirements Scheduled for Completion, but not Completed During the Reporting Period:

- 7.1 None

8. Explanation for Each Item of Non-Completion in Item 7:

- 8.1 Not Applicable

9. Specific Requirements to be Initiated in Next Reporting Period (Dec 2013 -Feb 2014):

- 9.1 Commencement of dewatering and partial remediation of Northeast Impoundment, pending receipt of NJDEP Flood Hazard Permit
- 9.2 Additional delineation sampling of Woodbridge Pond, Channel D area and limited scrape areas.



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October 14, 2013

Susan Schulz, Toxics Section Chief
U.S. EPA Region II
Pesticides & Toxic Substances Branch
2890 Woodbridge Avenue
Bldg. 10 (MS-105)
Edison, NJ 08837-3679

Mr. John M. Mitch, Clerk
Woodbridge Township
1 Main Street
Woodbridge, New Jersey 07095

Re: Hatco Site
Fords, New Jersey
Program Interest Number G000003943

Dear Ms. Schulz and Mr. Mitch:

Weston Solutions, Inc. (Weston) is forwarding Progress Report Number 32, which covers the activities associated with the Hatco Site from August 1, 2013 through September 30, 2013. The progress report is being submitted in accordance with the requirements of Weston's May 25, 2005 Administrative Consent Order and March 30, 2005 USEPA approval letter. If you have any questions, please do not hesitate to call me at (732) 417-5888.

Very truly yours,
WESTON SOLUTIONS, INC.

Michael A. Skirka
Project Manager

cc: M. Fisher – LSRP (ELM)
P. Meyer, S. Castles, K. Etela (Hatco/Chemtura)
K. Aiello (MCUA)
V. Puranapanda, S. Piatkowski, C. Stella, G. Kramer (ACE)
M. Miller (Drinker, Biddle & Reath)
File No. 2.5

ADMINISTRATIVE CONSENT ORDER
PROGRESS REPORT

1. Progress Report Number: 32
2. Site Location: Hatco Site
 1020 King Georges Post Rd.
 Fords, NJ 08863
3. Signatories: Weston Solutions, Inc.
 ACE American Insurance Company
 NJDEP
4. Reporting Period: August 1, 2013 through September 30, 2013
5. Specific Requirements Initiated and Completed During Reporting Period:
 - 5.1 August 27, 2013 submission of Progress Report No. 31
 - 5.2 Required annual monitoring of Phase 2 wetlands restoration
 - 5.3 Remediation of 23 "scrape area" soil hotspots
 - 5.4 Extension of LNAPL barrier wall and collection trench along the western portion of the site with 5 LNAPL collection sumps
 - 5.5 Received NJDEP discharge to surface water permit for Northeast Impoundment remediation
 - 5.6 Submittal of revised Soil and Erosion Control Plan to FSCD for Northeast Impoundment remediation
 - 5.7 Completion of NJDEP Remediation Cost Review, Remediation Funding Source Self-Guarantee Application and Annual Insurance Renewal Notification
6. Specific Requirements Previously Initiated Which are Continuing:
 - 6.1 Continuation of full-scale LNAPL recovery – Through September 30, 2013, we have recovered approximately 4,700 gallons of LNAPL.
 - 6.2 Maintenance of Phase 2 wetlands areas
 - 6.3 Geotechnical evaluation of former lagoon soil stockpile for capping
 - 6.4 Remediation planning for completion of isolated soil scrape areas with PCBs > 2 ppm
 - 6.5 Revisions to Flood Hazard Permit application after receipt of NJDEP comments on initial submittal
 - 6.6 Planning for remediation of southeast leg LNAPL removal, Northeast Impoundment remediation; Woodbridge Pond remediation
 - 6.7 Design of potential LNAPL barrier wall extensions
 - 6.8 Review of Channel D sampling data
 - 6.9 Review of additional sampling needs at Woodbridge Pond, Channel D area, and for limited site scrape areas
 - 6.10 Preparation of Case Inventory Document for LSRP review and to guide ongoing LSRP close-out of AOC remediation
 - 6.11 Preparation of preliminary draft conceptual remediation work plan for Woodbridge Pond

7. Specific Requirements Scheduled for Completion, but not Completed During the Reporting Period:

7.1 None

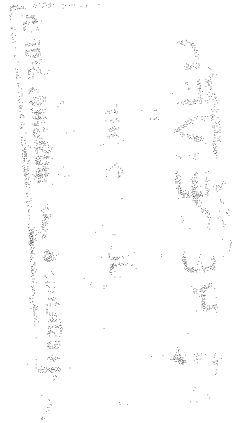
8. Explanation for Each Item of Non-Completion in Item 7:

8.1 Not Applicable

9. Specific Requirements to be Initiated in Next Reporting Period (Oct-Dec 2013):

9.1 Commencement of dewatering and partial remediation of northeast impoundment, pending receipt of NJDEP flood hazard permit

9.2 Additional sampling of Woodbridge Pond, Channel D area and limited scrape areas, pending ACE approval.





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205 CAMPUS DRIVE
EDISON, NEW JERSEY 08837
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VIA FEDEX

August 27, 2013

Susan Schulz, Toxics Section Chief
U.S. EPA Region II
Pesticides & Toxic Substances Branch
2890 Woodbridge Avenue
Bldg. 10 (MS-105)
Edison, NJ 08837-3679

Mr. John M. Mitch, Clerk
Woodbridge Township
1 Main Street
Woodbridge, New Jersey 07095

Re: Hatco Site
Fords, New Jersey
Program Interest Number G000003943

Dear Ms. Schulz and Mr. Mitch:

Weston Solutions, Inc. (Weston) is forwarding Progress Report Number 31, which covers the activities associated with the Hatco Site from January 1, 2013 through July 31, 2013. Mike Skirka assumed the position of Project Manager, replacing Dan Kopcow effective February 4, 2013. The progress report is being submitted in accordance with the requirements of Weston's May 25, 2005 Administrative Consent Order and March 30, 2005 USEPA approval letter. If you have any questions, please do not hesitate to call me at (732) 417-5888.

Very truly yours,
WESTON SOLUTIONS, INC.

A handwritten signature in black ink, appearing to read "Michael A. Skirka".

Michael A. Skirka
Project Manager

cc: M. Fisher – LSRP (ELM)
P. Meyer, S. Castles, K. Etela (Hatco/Chemtura)
K. Aiello (MCUA)
V. Puranapanda, S. Piatkowski, C. Stella, G. Kramer (ACE)
M. Miller (Drinker, Biddle & Reath)
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ADMINISTRATIVE CONSENT ORDER
PROGRESS REPORT

1. Progress Report Number: 31
2. Site Location: Hatco Site
1020 King Georges Post Rd.
Fords, NJ 08863
3. Signatories: Weston Solutions, Inc.
ACE American Insurance Company
NJDEP
4. Reporting Period: January 1, 2013 through July 31, 2013
5. Specific Requirements Initiated and Completed During Reporting Period:
 - 5.1 January 14, 2013 submission of Progress Report No. 30
 - 5.2 Continuation of full-scale LNAPL recovery
 - 5.3 Completion of Phase 2 wetlands restoration
 - 5.4 NJDEP inspection of Phase 2 wetlands restoration and commendation
 - 5.5 Sampling of Woodbridge Pond and Northeast Impoundment
 - 5.6 Completion of a round of site-wide groundwater sampling
 - 5.7 Completion of discharge to surface water and flood hazard permit applications related to the northeast impoundment remediation
 - 5.8 LSRP-approval of 40 ppm alternative cleanup standard for naphthalene for the northeast impoundment
6. Specific Requirements Previously Initiated Which are Continuing:
 - 6.1 LNAPL recovery – Through July 31, 2013, we have recovered approximately 4,200 gallons of LNAPL.
 - 6.2 Maintenance of Phase 2 wetlands areas
 - 6.3 Geotechnical evaluation of former lagoon soil stockpile for capping
 - 6.4 Remediation of isolated soil scrape areas with PCBs > 2 ppm
 - 6.5 Planning for remediation of southeast leg LNAPL removal, northeast impoundment remediation; Woodbridge Pond remediation
 - 6.6 Design of potential LNAPL barrier wall
 - 6.7 Review of Channel D sampling data
 - 6.8 Review of additional sampling at Woodbridge Pond, Channel D
7. Specific Requirements Scheduled for Completion, but not Completed During the Reporting Period:
 - 7.1 Remediation of southeast leg LNAPL area (rescheduled for Summer 2014)

8. Explanation for Each Item of Non-Completion in Item 7:

- 8.1 Additional remediation planning required due to location of active utilities and other facility structures near excavation areas. Support of excavation requirements must be evaluated and designed. High water table also requires redesign of remediation approach for extensive water handling. Specialty subcontractors must be identified and coordinated.

9. Specific Requirements to be Initiated in Next Reporting Period (Aug-Sep 2013):

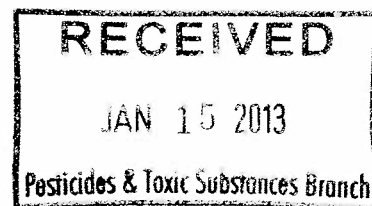
- 9.1 Commencement of remediation of northeast impoundment, pending receipt of NJDEP discharge and flood hazard permits
- 9.2 Additional sampling of Woodbridge Pond and Channel D, pending ACE approval.
- 9.3 Preparation of remediation work plan addendum for Woodbridge Pond



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January 14, 2013

Henry A. Mazzucca, Toxics Section Chief
U.S. EPA Region II
Pesticides & Toxic Substances Branch
2890 Woodbridge Avenue
Bldg. 10 (MS-105)
Edison, NJ 08837-3679

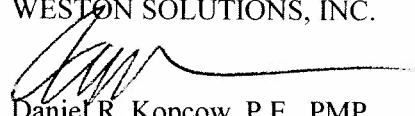
Mr. John M. Mitch, Clerk
Woodbridge Township
1 Main Street
Woodbridge, New Jersey 07095

Re: Hatco Site
Fords, New Jersey
Program Interest Number G000003943

Dear Mr. Mazzucca and Mr. Mitch:

Weston Solutions, Inc. (Weston) is forwarding Progress Report Number 30, which covers the activities associated with the Hatco Site from October 1, 2012 through December 31, 2012. The progress report is being submitted in accordance with the requirements of Weston's May 25, 2005 Administrative Consent Order and March 30, 2005 USEPA approval letter. If you have any questions, please do not hesitate to call me at (732) 417-5834.

Very truly yours,
WESTON SOLUTIONS, INC.



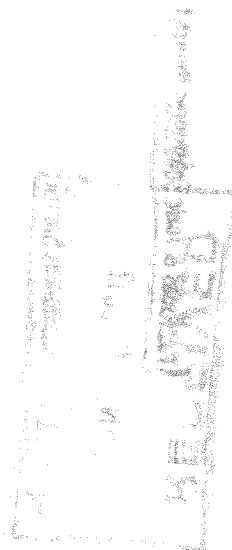
Daniel R. Kopcow, P.E., PMP
Project Manager

cc: M. Fisher – LSRP (ELM)
P. Meyer, S. Castles, J. Spillane, K. Etela (Hatco/Chemtura)
K. Aiello (MCUA)
V. Puranapanda, S. Piatkowski, C. Stella, G. Kramer (ACE)
G. Nichols (Drinker, Biddle & Reath)
File No. 2.5



ADMINISTRATIVE CONSENT ORDER
PROGRESS REPORT

1. Progress Report Number: 30
2. Site Location: Hatco Site
1020 King Georges Post Rd.
Fords, NJ 08863
3. Signatories: Weston Solutions, Inc.
ACE American Insurance Company
NJDEP
4. Reporting Period: October 1, 2012 through December 31, 2012
5. Specific Requirements Initiated and Completed During Reporting Period:
 - 5.1 October 9, 2012 submission of Progress Report No. 29
 - 5.2 Continuation of full-scale LNAPL recovery
 - 5.3 Completion of Phase 2 wetlands restoration
6. Specific Requirements Previously Initiated Which are Continuing:
 - 6.1 LNAPL recovery – Through December 31, 2012, we have recovered approximately 2,500 gallons of LNAPL.
7. Specific Requirements Scheduled for Completion, but not Completed During the Reporting Period:
 - 7.1 N/A
8. Explanation for Each Item of Non-Completion in Item 7:
 - 8.1 N/A
9. Specific Requirements to be Initiated in Next Reporting Period:
 - 9.1 Awaiting EPA response to September 17, 2012 Weston letter to EPA regarding updated extent of LNAPL plume
 - 9.2 Commencement of remediation of Southeast leg of LNAPL plume
 - 9.3 Continued full-scale LNAPL Recovery



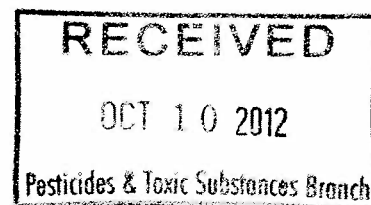
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October 9, 2012

Henry A. Mazzucca, Toxics Section Chief
U.S. EPA Region II
Pesticides & Toxic Substances Branch
2890 Woodbridge Avenue
Bldg. 10 (MS-105)
Edison, NJ 08837-3679

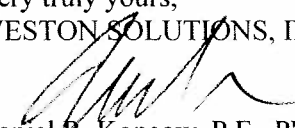
Mr. John M. Mitch, Clerk
Woodbridge Township
1 Main Street
Woodbridge, New Jersey 07095

Re: Hatco Site
Fords, New Jersey
Program Interest Number G000003943

Dear Mr. Mazzucca and Mr. Mitch:

Weston Solutions, Inc. (Weston) is forwarding Progress Report Number 29, which covers the activities associated with the Hatco Site from July 1, 2012 through September 30, 2012. The progress report is being submitted in accordance with the requirements of Weston's May 25, 2005 Administrative Consent Order and March 30, 2005 USEPA approval letter. If you have any questions, please do not hesitate to call me at (732) 417-5834.

Very truly yours,
WESTON SOLUTIONS, INC.


Daniel R. Kopcow, P.E., PMP
Project Manager

cc: M. Fisher – LSRP (ELM)
P. Meyer, S. Castles, J. Spillane, K. Etela (Hatco/Chemtura)
K. Aiello (MCUA)
V. Puranapanda, S. Piatkowski, C. Stella, G. Kramer (ACE)
G. Nichols (Drinker, Biddle & Reath)
File No. 2.5



ADMINISTRATIVE CONSENT ORDER
PROGRESS REPORT

1. Progress Report Number: 29
2. Site Location: Hatco Site
1020 King Georges Post Rd.
Fords, NJ 08863
3. Signatories: Weston Solutions, Inc.
ACE American Insurance Company
NJDEP
4. Reporting Period: July 1, 2012 through September 30, 2012
5. Specific Requirements Initiated and Completed During Reporting Period:
 - 5.1 July 27, 2012 submission of Progress Report No. 28
 - 5.2 Continuation of Phase 1 LNAPL recovery
 - 5.3 Completion of installation and development of Phase 2 LNAPL recovery wells
 - 5.4 Completion of Phase 2 wetlands remediation
 - 5.5 September 17, 2012 submission of letter to EPA regarding updated extent of LNAPL plume
 - 5.6 October 3, 2012 submission of Phase 2 Wetlands Remediation Progress Report
6. Specific Requirements Previously Initiated Which are Continuing:
 - 6.1 LNAPL recovery – Through September 30, 2012, we have recovered approximately 2,100 gallons of LNAPL.
7. Specific Requirements Scheduled for Completion, but not Completed During the Reporting Period:
 - 7.1 N/A
8. Explanation for Each Item of Non-Completion in Item 7:
 - 8.1 N/A
9. Specific Requirements to be Initiated in Next Reporting Period:
 - 9.1 Wetlands restoration
 - 9.2 Commencement of remediation of Southeast leg of LNAPL plume
 - 9.3 Continued full-scale LNAPL Recovery



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July 27, 2012

Henry A. Mazzucca, Toxics Section Chief
U.S. EPA Region II
Pesticides & Toxic Substances Branch
2890 Woodbridge Avenue
Bldg. 10 (MS-105)
Edison, NJ 08837-3679

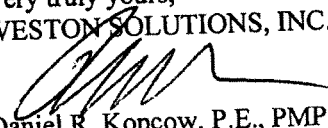
Mr. John M. Mitch, Clerk
Woodbridge Township
1 Main Street
Woodbridge, New Jersey 07095

Re: Hatco Site
Fords, New Jersey
Program Interest Number G000003943

Dear Mr. Mazzucca and Mr. Mitch:

Weston Solutions, Inc. (Weston) is forwarding Progress Report Number 28, which covers the activities associated with the Hatco Site from April 1, 2012 through June 30, 2012. The progress report is being submitted in accordance with the requirements of Weston's May 25, 2005 Administrative Consent Order and March 30, 2005 USEPA approval letter. If you have any questions, please do not hesitate to call me at (732) 417-5834.

Very truly yours,
WESTON SOLUTIONS, INC.


Daniel R. Kopcow, P.E., PMP
Project Manager

cc: M. Fisher – LSRP (ELM)
P. Meyer, S. Castles, J. Gregus, K. Etela (Hatco/Chemtura)
K. Aiello (MCUA)
V. Puranapanda, S. Piatkowski, C. Stella, G. Kramer (ACE)
G. Nichols (Drinker, Biddle & Reath)
File No. 2.5



ADMINISTRATIVE CONSENT ORDER
PROGRESS REPORT

1. Progress Report Number: 28
2. Site Location: Hatco Site
1020 King Georges Post Rd.
Fords, NJ 08863
3. Signatories: Weston Solutions, Inc.
ACE American Insurance Company
NJDEP
4. Reporting Period: April 1, 2012 through June 30, 2012
5. Specific Requirements Initiated and Completed During Reporting Period:
 - 5.1 April 3, 2012 submission of Progress Report No. 27
 - 5.2 Completion of Channel D delineation on EPEC property
 - 5.3 Continuation of Phase 1 LNAPL recovery
 - 5.4 Phase 2 wetlands remediation
 - 5.5 May 31, 2012 submission of Phase I LNAPL/Phase II LNAPL Recovery System Design Progress Report
 - 5.6 June 1, 2012 EPA approval of Northeast Impoundment Remediation
6. Specific Requirements Previously Initiated Which are Continuing:
 - 6.1 Phase 1 LNAPL recovery – Through June 30, 2012, we have recovered approximately 1,700 gallons of LNAPL.
7. Specific Requirements Scheduled for Completion, but not Completed During the Reporting Period:
 - 7.1 N/A
8. Explanation for Each Item of Non-Completion in Item 7:
 - 8.1 N/A
9. Specific Requirements to be Initiated in Next Reporting Period:
 - 9.1 Wetlands restoration
 - 9.2 Northeast Impoundment remediation
 - 9.3 Continued Phase 1 LNAPL Recovery
 - 9.4 Installation of Phase 2 LNAPL recovery wells and operation of full-scale LNAPL recovery system

9.5 Remediation of south-east leg of LNAPL plume



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VIA FEDEX

April 3, 2012

Henry A. Mazzucca, Toxics Section Chief
U.S. EPA Region II
Pesticides & Toxic Substances Branch
2890 Woodbridge Avenue
Bldg. 10 (MS-105)
Edison, NJ 08837-3679

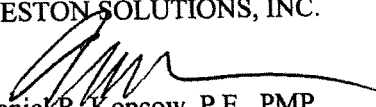
Mr. John M. Mitch, Clerk
Woodbridge Township
1 Main Street
Woodbridge, New Jersey 07095

Re: Hatco Site
Fords, New Jersey
Program Interest Number G000003943

Dear Mr. Mazzucca and Mr. Mitch:

Weston Solutions, Inc. (Weston) is forwarding Progress Report Number 27, which covers the activities associated with the Hatco Site from January 1, 2012 through March 31, 2012. The progress report is being submitted in accordance with the requirements of Weston's May 25, 2005 Administrative Consent Order and March 30, 2005 USEPA approval letter. If you have any questions, please do not hesitate to call me at (732) 417-5834.

Very truly yours,
WESTON SOLUTIONS, INC.


Daniel R. Kopcow, P.E., PMP
Project Manager

cc: M. Fisher – LSRP (ELM)
P. Meyer, S. Castles, J. Gregus, K. Etela (Hatco/Chemtura)
K. Aiello (MCUA)
V. Puranapanda, S. Piatkowski, C. Stella, G. Kramer (ACE)
G. Nichols (Drinker, Biddle & Reath)
File No. 2.5



ADMINISTRATIVE CONSENT ORDER
PROGRESS REPORT

1. Progress Report Number: 27
2. Site Location: Hatco Site
1020 King Georges Post Rd.
Fords, NJ 08863
3. Signatories: Weston Solutions, Inc.
ACE American Insurance Company
NJDEP
4. Reporting Period: January 1, 2012 through March 31, 2012
5. Specific Requirements Initiated and Completed During Reporting Period:
 - 5.1 January 18, 2012 submission of Progress Report No. 26
 - 5.2 Completion of LNAPL vertical barrier wall installation
 - 5.3 Initiation of Phase 1 LNAPL recovery
 - 5.4 Completion of the approved VIWP
 - 5.5 Phase 2 wetlands remediation
6. Specific Requirements Previously Initiated Which are Continuing:
 - 6.1 Remaining Channel D Sampling Plan execution
 - 6.2 Phase 1 LNAPL recovery – **Through March 31, 2012, we have recovered approximately 1,370 gallons of LNAPL.**
7. Specific Requirements Scheduled for Completion, but not Completed During the Reporting Period:
 - 7.1 N/A
8. Explanation for Each Item of Non-Completion in Item 7:
 - 8.1 N/A
9. Specific Requirements to be Initiated in Next Reporting Period:
 - 9.1 Wetlands restoration
 - 9.2 Complete Channel D Sampling Plan implementation
 - 9.3 Northeast Impoundment remediation
 - 9.4 Continued LNAPL recovery from trenches and sumps
 - 9.5 Remediation of south-east leg of LNAPL plume